

OFFICE OF PROFESSIONAL ACCOUNTABILITY (OPA)

COMPLAINT REPORT

August - September 2012

OPA Director's Monthly Message

The Office of Professional Accountability's (OPA) monthly report provides information about Seattle Police Department (SPD) misconduct complaints that are investigated by OPA. This report includes summaries as to cases closed during the months of August and September 2012, along with data on the number and classification of complaints filed, with a comparison to earlier months and 2011. Monthly reports include charts showing the percentage of cases closed with different types of findings, information about the OPA mediation program, and policy review and training recommendations when made.

- In the first 9 months of 2012, there were complaints filed against 193 employees, representing 10.7% of all 1,803 employees (1,292 sworn and 511 civilian).
- 13% of allegations closed since January 2012 were Sustained, resulting in discipline (as compared to a total of 12% Sustained complaints in 2011).
- 17% of allegations closed to date in 2012 resulted in a Training Referral, meaning that the named employee received training or counseling as a result of the complaint (as compared to a total of 21% of allegations closed with a similar finding in 2011).
- The remaining cases were closed as Unfounded, Lawful and Proper, or Inconclusive.

Though the great majority of Seattle Police Officers never receive an OPA complaint, when a complaint is received, the most common allegation is that the involved officer was rude or unprofessional during the encounter. This monthly report includes examples of conduct that OPA found particularly troublesome, such as profanity directed towards juveniles, which resulted in discipline for the named officers. However, most allegations of discourteous conduct do not require a full investigation, and instead are referred to the employee's supervisor to handle. The supervisor contacts the complainant for information about the incident, discusses the complainant's experience with the officer, and then documents the process in a closing letter to the complainant and a report back to OPA.

Officers who have developed effective communication strategies and who avoid complaints of unprofessional conduct typically follow several important steps when they interact with the public. When someone is detained but is compliant and responsive to the officer's directions, the officer is not likely to receive an OPA complaint if he or she:

1. Asks question to help the officer understand the civilian's perspective;
2. Explains why the officer is taking law enforcement action;
3. Thanks the civilian for providing information and responding to the officer.

Citizens report they feel more respected when officers follow these three steps, even if they have violated the law. When officers take the time to listen and ask questions, explain their own actions and thank citizens for their cooperation, it can go a long way toward helping the public feel respected, cuts down on OPA complaints, and builds community trust.



Seattle Police Department – Office of Professional Accountability

Complaint Report
August - September 2012

Cases involving alleged misconduct of SPD employees in the course of their official public duties are summarized below. Identifying information has been removed.

August - September 2012 Closed Cases

Case Summary	Case Finding
<p>The complainant, an SPD supervisor, alleges that named officer was involved in a fight disturbance outside a downtown club. During the disturbance, officers responded and placed several people in handcuffs. It is alleged that the named employee walked over to a person who was handcuffed and kicked him in the head.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none">1. Violation of Law (Misdemeanor Assault)- Unfounded2. Professionalism-Exercise of Discretion- Training Referral3. Alcohol/Substance Use Wearing Recognizable Part of Police Uniform- Inconclusive4. Unnecessary Use of Force-Sustained <p>The named officer was charged in Municipal Court for misdemeanor assault and a jury determined that the named officer was not guilty of criminal assault. The evidence showed, however, that the named officer was unjustified in using his foot to contact the head of a handcuffed subject; this action was neither necessary nor reasonable. The evidence also demonstrated that the named employee used poor discretion when confronting an individual regarding items he thought she had stolen from him. A Training Referral will allow the supervisor of the named employee to review the incident to determine how his actions contributed to the events that unfolded. Though making a Training Referral, the Chief and OPA Director pointed to evidence of racial animus in actions taken by some individuals who confronted the named employee, which was of great concern. The evidence was neither proved nor disproved regarding whether the named employee violated Department policy addressing the use of intoxicants.</p> <p>Corrective action: 10-day suspension without pay will be held in abeyance for 2 years; if allegation(s) of the same or similar misconduct are sustained in the 2 year time period, the 10-day suspension without pay will be imposed as well as any new discipline for the subsequent misconduct; Retraining by the Deputy Chief of Operations on handling off-duty/plain clothes enforcement.</p>



Seattle Police Department – Office of Professional Accountability

Case Summary	Case Finding
<p>The complainant, a supervisor within the Department, alleges that named employee sexually abused his 14 year old stepdaughter.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Violation of Law (child molestation)—Inconclusive <p>The evidence collected during both criminal and administrative investigations did not prove or disprove the allegation.</p>
<p>The complainant, a department supervisor, alleges that the off duty named employee was arrested for DV Assault.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Violation of Law (DV Assault)—Sustained <p>The evidence, including the named officer's voluntary acknowledgement of the fact that his conduct constitutes the crime alleged, demonstrated a violation. However, there were mitigating factors taken into account by the court and Chief.</p> <p>Corrective action: 30-day suspension without pay; Disciplinary transfer; Last Chance Agreement</p>
<p>The complainant alleges that the named officers entered his home without permission and that named employee #2 was rude and aggressive.</p>	<p>Allegation and Finding:</p> <p>Officer #1</p> <ol style="list-style-type: none"> 1. Improper Search—Unfounded <p>Officer #2</p> <ol style="list-style-type: none"> 1. Improper Search—Training Referral 2. Discourtesy/Rudeness—Training Referral <p>The evidence demonstrated that Officer #2 pushed himself and Office #1 into complainant's residence while responding to a possible burglary incident. A Training Referral finding for Officer #2 will allow a supervisor to discuss the incident, the law and policy regarding searches and to also discuss the impact of his behavior during this incident. Because the Chief did not adopt the OPA Director's recommendation of sustained, an explanation was provided to the Mayor and City Council pursuant to Seattle Ordinance 3.28.812.</p>
<p>The complainant alleges that the named employee, a Parking Enforcement Officer, was rude and called her a profane name.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Professionalism-Discourtesy—Inconclusive 2. Professionalism-Profanity—Inconclusive <p>The evidence showed that the misconduct alleged was neither proved nor disproved by a preponderance of the evidence.</p>



Seattle Police Department – Office of Professional Accountability

Case Summary	Case Finding
<p>The complainant, after making multiple phone calls to a business stating he was going to blow up the business with a bomb, alleges that the named employees broke down his door, illegally entered his residence, place handcuffs on him too tightly, and used unnecessary force when he was punched in the face and kicked in the leg.</p>	<p>Allegation and Finding: 2 named Officers and 1 named Sergeant Same allegations and same finding</p> <ol style="list-style-type: none"> 1. Unnecessary Use of Force—Lawful & Proper 2. Improper Search—Lawful & Proper <p>The evidence demonstrated that the named officers were justified in forcefully entering the complainant's residence per Department policy, under either an exigent circumstance or a community care taking function theory. The evidence also demonstrated that the named employees used minimal, reasonable, necessary and non-reportable force when they placed the complainant on the floor and handcuffed him.</p>
<p>The complainant alleges that the named officer, while off-duty and in uniform, followed her to her residence in his personal vehicle, outside of the city limits, and conducted a traffic stop on her.</p>	<p>Allegation and Finding: 1. Professionalism-Lack of Discretion—Training Referral</p> <p>The evidence demonstrated that the now retired officer failed to officially document his police action or to formally notify the Department that he had exercised his police authority outside the jurisdiction of the city while off-duty, driving his personal car and wearing a Seattle Police uniform. Though the named employee is now retired, the Training Referral will be noted in his personnel file in case he seeks authorization to do commissioned work for the Department and the appropriate counseling can take place at that time.</p>
<p>The complainant alleges that the named employee was racially profiling him when named employee stopped him without justification for shoplifting.</p>	<p>Allegation and Finding: 1. Biased Policing—Unfounded</p> <p>The evidence demonstrated that the named employee had justification to stop complainant after receiving information from a store employee who observed complainant picking up items inside the store and believed he fit the description of a chronic shoplifter. After clearing up the misidentification, both the store manager and named employee apologized for the mix-up and the complainant was given a \$25 gift certificate for the inconvenience.</p>



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Case Summary	Case Finding
<p>The complainant alleges the named officers used unnecessary force on him when taking him into custody for brandishing knives in the Metro bus tunnel. The complainant also alleges that a necklace he was wearing when arrested was lost.</p>	<p>Allegation and Finding: 2 named officer, same allegation, same finding</p> <ol style="list-style-type: none"> 1. Unnecessary Use of Force—Lawful & Proper 2. Mishandling Evidence/Property—Training Referral <p>The evidence showed that the named officers used minimal, necessary and reasonable force when taking the complainant into custody. The evidence also demonstrated that the named officers should have been more vigilant in safeguarding the complainant's property. A Training Referral will benefit the named officers, by discussing this incident with their supervisor and the importance of safeguarding property entrusted in their care or seized during an arrest.</p> <p>Note: This case and other investigations have raised issues identified by the OPA Director and Auditor related to the protocol to be followed when SPD is involved in an incident along with another law enforcement agency. Though there is a Memorandum of Understanding that covers some issues related to joint agency incident response, it is not clearly referenced in SPD policy. The Professional Standards Section has agreed to review these issues and advise whether policy or protocol changes should be made.</p>
<p>The complainant, a family member of the named employee, alleges that the named employee misused his police authority to make a complaint against her with Washington State Child Protective Services (CPS).</p>	<p>Allegation and Finding: 1. Misuse of Authority—Unfounded</p> <p>The evidence, including a letter from CPS stating the named officer never made a complaint to CPS, demonstrated the alleged misconduct did not occur.</p>
<p>The complainant, a school counselor, alleges that the named officer failed to properly investigate and document a domestic violence incident between two siblings. It is also alleged that named employee was discourteous when he made contact with one of the siblings involved in the incident.</p>	<p>Allegation and Finding: 1. Professionalism-Courtesy—Unfounded 2. Failure to Take Appropriate Action—Unfounded</p> <p>The evidence demonstrated that the named officer accurately investigated and documented the incident. The evidence also showed that the named officer acted in a reasonable, conscientious and professional manner toward the parties involved.</p>



Seattle Police Department – Office of Professional Accountability

Case Summary	Case Finding
<p>The complainant alleges that named employees took an emergency light bar from an in-service police vehicle for use in a display at the Seattle Police Museum.</p>	<p>Allegation and Finding: 2 named employees, same allegation, same finding</p> <ol style="list-style-type: none"> 1. Violation of Law (Theft)—Unfounded <p>The evidence demonstrated that the police light bar was a surplus item and was not improperly appropriated for use as a prop for the Seattle Police Museum.</p> <p>Note: OPA suggests that the connection between the Seattle Police Department and the Police Museum should be reviewed to determine if there are actual or perceived conflicts of interest and possible inappropriate gifting of city services and/or funds. An SPD Captain has agreed to take the lead on following up with the Chief and others to get direction as to whether this matter should be forwarded to the Ethics and Elections Commission, City Council or others to address issues raised about the role of SPD in supporting the Police Museum.</p>
<p>The complainant, while being transported to jail, alleges he became injured due to named officer's failure to seatbelt him in the patrol car causing him to tip over when named officer took a sharp turn. It is also alleged that named officer mockingly laughed at him when he tipped over. OPA also added an allegation of Failure to Use In-Car Video System.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Prisoner Handling & Transport/Seat Belting Prisoners—Lawful & Proper 2. Failure to Use In-Car Video—Sustained 3. Professionalism-Courtesy—Inconclusive <p>The evidence demonstrated that named officer exercised permissible discretion when he chose not to seatbelt the complainant in the backseat of his patrol car. The evidence was neither proved nor disproved that the named officer mockingly laughed at the complainant. The evidence showed that the named officer did not use the In-Car Video System per Department policy.</p> <p>Corrective action: Oral reprimand.</p>
<p>The complainant, an employee within the department, alleges that the named employee filed a frivolous complaint against him with no substantial evidence and the complaint may have been politically motivated.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Professionalism-Exercise of Discretion—Unfounded <p>The evidence demonstrated that the named employee acted reasonably and with cause when he initiated an investigation that supported a reasonable suspicion of complainant's behavior. The evidence also showed that the initiated complaint was not politically motivated.</p>



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Case Summary	Case Finding
The complainant, who was being taken into custody for possession of narcotics, alleges that the named officer used excessive force by striking him several times about the head, neck and back with a “billy club”.	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Unnecessary Use of Force—Lawful & Proper <p>The evidence, including information from the Seattle Fire Department Medic Unit summoned by the named employee, demonstrated that the complainant did not have injuries consistent to being beat about the neck, head and shoulders with a blunt instrument. The named officer used reasonable and necessary force, properly documented the force used, and had the event screened by a patrol supervisor.</p>
The complainant, a supervisor within the Department, alleges that in a previous OPA case, named officer made statements that were intentionally dishonest.	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Dishonesty—Inconclusive <p>The allegation could not be proved nor disproved by a preponderance of the evidence.</p>
The complainant alleges that unknown officers stopped him for suspicion of being involved with a drug transaction. During this stop, one unknown officer allegedly removed money from his wallet and told him it was being seized for forfeiture. The complainant alleges he was not arrested, not given a receipt for the money, nor given a case number.	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Violation of Law (Theft)—Unfounded <p>The evidence collected during a criminal investigation, did not support complainant's allegation..</p>
The complainant, during her arrest in 2010, alleges that the named officer used unnecessary force while making the arrest.	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Unnecessary Use of Force—Lawful & Proper <p>The evidence demonstrated that the named officer used reasonable and justifiable force and thoroughly documented the incident.</p>
An anonymous complainant alleges that the named employee regularly received free food and drinks, both alcohol and non-alcohol drinks, on and off-duty in un-named Belltown Neighborhood businesses. The complainant also alleged the named employee bragged of giving “whooping to drunk, ghetto” people.	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Integrity/Gratuities—Unfounded 2. Professionalism-Derogatory Language—Unfounded 3. Alcohol/Intoxicants—Unfounded 4. Unnecessary Use of Force—Unfounded <p>The evidence demonstrated that the alleged misconduct more than likely did not occur.</p>



Seattle Police Department – Office of Professional Accountability

Case Summary	Case Finding
<p>The complainant, father of juvenile subject, alleges named employee, while off-duty and after identifying himself as a Seattle Police sergeant, swore at his son, and called him names while accusing him of being involved in suspicious activity.</p>	<p>Allegation and Finding:</p> <ul style="list-style-type: none">• Exercise of Discretion-Sustained• Professionalism-Profanity-Sustained• Professionalism-Discourtesy-Sustained <p>The evidence demonstrated that the named employee, while making contact with juveniles near his residence, used poor discretion when he verbally identified himself as a Seattle Police sergeant, displayed his Seattle Police badge, and concluded that the juveniles had a legal obligation to answer his questions or explain their presence. The evidence also showed that the named employee used profanity and was discourteous when talking with the juveniles and their parents.</p> <p>Corrective action: 2-day suspension without pay; 1 day will be held in abeyance for 1 year; if any future sustained allegations of the same or similar misconduct occur, they will result in imposition of the remaining 1 day suspension without pay in addition to the discipline resulting from the new case.</p>
<p>The complainant, a special agent with the US Army, alleges that named employee may be in receipt of stolen government property.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none">1. Violation of Law (Possession of Stolen Property)—Unfounded <p>The evidence showed no evidence that the named employee had any involvement in the US Army's theft investigation.</p>
<p>The anonymous complainant alleges, in a brief voicemail message to OPA-IS, that the named employee threatened his life.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none">1. Violation of Law (Threats)—Unfounded <p>The evidence demonstrated that without knowing the identity of the caller, there is no way to conduct a criminal investigation into this matter. In addition, since the caller left no other details, it cannot be assumed that the named employee was involved.</p>



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Case Summary	Case Finding
<p>The complainant, an ex-paramour of named employee, alleges that named employee accessed a department database to obtain her residential address.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Communicating Confidential Information—Training Referral <p>The evidence, including admission by the named officer, demonstrated the named officer did use a department database to obtain the complainant's address.</p> <p>Note: OPA discovered that the wrong Manual section was inadvertently listed in this complaint. Had the correct allegation been used, this case would have been sustained. However, the Collective Bargaining Contract does not permit an amendment of the allegation after 30 days, unless new facts are involved. A Training Referral takes into account the misidentification of the relevant Manual section and ensures that a supervisor will address the misconduct with the named employee.</p>
<p>The complainant, a victim of a robbery, alleges that the named employee used unnecessary force by pushing him into a seated position.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Unnecessary Use of Force—Lawful & Proper <p>The evidence demonstrated that the named employee used minimal force that was reasonable and necessary and non-reportable under Department policy.</p>
<p>The complainant, a police officer from Edmonton, Canada that was in route to a Mariner game, alleges that the named officer was rude and threatened to arrest him when he failed to provide ID during a jaywalking incident.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Professionalism-Courtesy-Inconclusive 2. Professionalism-Exercise of Discretion-Lawful & Proper <p>The evidence was inconclusive as to whether the named officer was rude to the complainant. Witnesses to the incident declined to be involved. The evidence showed that the named officer was justified in stopping and contacting the complainant who committed a pedestrian violation in his presence.</p>



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Case Summary	Case Finding
<p>The complainant, who was involved in a disturbance, alleges that named officer #1 used a racial comment and was discourteous when contacting him and his friends. OPA added named officer #2 to this complaint after reviewing in-car video/audio and alleges that named officer #2 used profanity and unprofessional comments to no one in particular and out of earshot of others.</p>	<p>Allegation and Finding:</p> <p>Named officer #1</p> <ol style="list-style-type: none"> 1. Biased Policing—Inconclusive 2. Professionalism-Courtesy—Sustained <p>Named officer #2</p> <ol style="list-style-type: none"> 1. Professionalism-Profanity—Sustained 2. Professionalism-Discretion—Sustained <p>The allegation of racial comments against named officer #1 was neither proved nor disproved by a preponderance of the evidence. The evidence demonstrated, including admission by named officer #1, that he was less than courteous when he made contact with the complainant and his group of friends. The evidence also demonstrated that named officer #2 did use profanity and used poor discretion when uttering profanity and unprofessional comments into the In-Car Audio System.</p> <p>Corrective action: Written reprimand; disciplinary transfer held in abeyance for 1 year; if any future sustained allegations of the same or similar misconduct occur, they will result in imposition of the disciplinary transfer in addition to discipline resulting from new case.</p>
<p>The complainant, who was observing the investigation and arrest of juveniles who removed a package from a neighbor's porch, alleges that the named officer was discourteous, threatened to arrest her if she did not move, and used profanity when speaking to the juvenile suspects.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none"> 1. Professionalism-Courtesy—Sustained 2. Professionalism-Profanity—Sustained 3. Professionalism-Policy—Sustained <p>The evidence, including in-car video, demonstrated that the named officer was unprofessional and discourteous when he made contact with the complainant. The evidence also showed the named employee used profanity when speaking with the juvenile subjects.</p> <p>Corrective action: Written reprimand</p>



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Case Summary	Case Finding
<p>The complainant, mother of juvenile subject who was arrested and released for criminal trespass, alleges that named officers used unnecessary force when arresting her son, used poor discretion arresting him for such a minor violation, and failed to notify her that her son had been arrested and released.</p>	<p>Allegation and Finding: Named Officer #1</p> <ol style="list-style-type: none">1. Professionalism-Exercise of Discretion—Lawful & Proper2. Unnecessary Use of Force—Unfounded3. Failure to Report Use of Force—Unfounded4. Parental Notification Juvenile Arrest—Training Referral <p>Named Officer #2</p> <ol style="list-style-type: none">1. Unnecessary Use of Force—Unfounded2. Failure to Report Use of Force—Unfounded3. Parental Notification Juvenile Arrest—Training Referral <p>The evidence demonstrated that the officers had legal justification to arrest the 17 year old juvenile subject for criminal trespass. The evidence also demonstrated that the named officer used minimal force to hold onto and guide the uncooperative subject's arms and hands into the handcuffs, the force used was reasonable and necessary and did not rise to the level of force required to be reported by Department Policy. The evidence supports the finding of Training Referral for the allegation that the named employees failed to notify the subject's parent of his arrest and release from custody. The Training Referral will benefit the named officers by discussing with their supervisor the importance of notifying the parents or legal guardians of the status and whereabouts of a juvenile when in contact with the police.</p> <p>Note: OPA recommended that the Professional Standards Section reissue the revised 16.040 Policy, Juvenile Investigations and Arrests, and that training be developed that can be provided throughout the Department on parental notification and documentation requirements when juveniles are arrested and other aspects of the policy. Though not required in the new policy, Captain Dermody also urged that training advise that documentation of efforts to contact DSHS or other resources is recommended.</p>



Seattle Police Department – Office of Professional Accountability

Case Summary	Case Finding
<p>The complainant, the victim of a domestic violence incident in which the named employee was dispatched, alleges named employee failed to write a police report of the incident.</p>	<p>Allegation and Finding:</p> <ol style="list-style-type: none">1. Professionalism-Exercise of Discretion— Sustained2. Incomplete Primary Investigation— Sustained <p>The evidence demonstrated that the named employee used poor discretion in not writing a police report because of conflicting information he received from the parties involved. The evidence also demonstrated that the named employee failed to comply with department policy on investigating and documenting a domestic violence incident.</p> <p>Corrective action: Written reprimand</p> <p>Note: The Professional Standards Unit has been working to consolidate and rewrite domestic violence policies and will ensure that there is sufficient guidance to officers about when to write a General Offense report in domestic violence situations. The OPA Director has recommended that, once the policy is revised, consideration be given as to how training can incorporate the revised policy into other report writing, investigation and/or DV specific training.</p>



Seattle Police Department – Office of Professional Accountability

Definition of Findings:

"Inconclusive" (formerly Not Sustained) means the allegation of misconduct was neither proved nor disproved by a preponderance of the evidence.

"Lawful and Proper" (formerly Exonerated) means a preponderance of evidence indicates the conduct alleged did occur, but that the conduct was justified, lawful and proper.

"Sustained" means the allegation of misconduct is supported by a preponderance of the evidence.

"Training Referral" (formerly Supervisory Intervention) means while there may have been a violation of policy, it was not a willful violation, and/or the violation did not amount to misconduct. The employee's chain of command is to provide appropriate training, counseling and/or to review for deficient policies or inadequate training.

"Unfounded" means a preponderance of evidence indicates the alleged act did not occur as reported or classified, or is false.

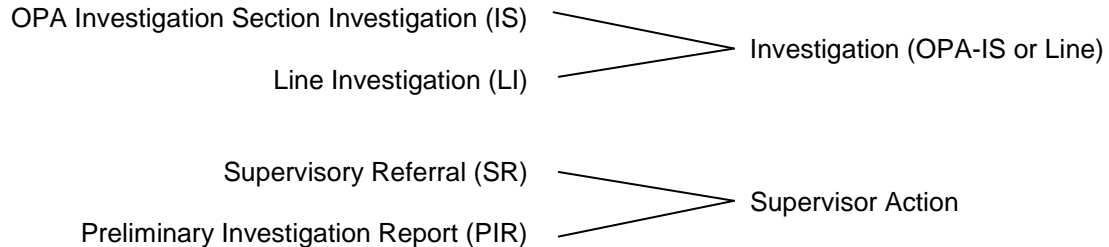
Mediation Program

The OPA Director and Auditor selected 5 cases during the months of August and September 2012 to be resolved through the Mediation Program. Of the 5 cases that were selected, 2 complainants agreed to mediate complaint and in another case OPA is waiting to hear back from named employee after the complainant has agreed to mediation. In 1 case, a complainant agreed to mediation but the named employee declined and in 1 case OPA has not made contact with the complainant.



Cases Opened -2011/2012 by Month Comparison

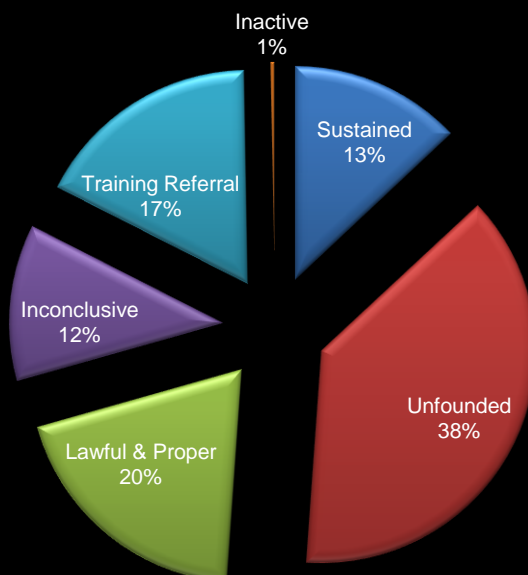
	PIR/SR	Supervisor Action	LI/IS	Investigation	TOTAL	
Date	2011	2012	2011	2012	2011	2012
1/1-1/31	17	33	20	16	37	49
2/1-2/29	24	27	18	14	42	41
3/1-3/31	19	26	13	10	32	36
4/1-4/30	31	40	23	20	54	60
5/1-5/31	37	42	19	17	56	59
6/1-6/30	29	28	15	18	44	46
7/1-7/31	26	33	9	18	35	51
8/1-8/31	39	46	16	15	55	61
9/1-9/30	22	40	13	17	35	57
10/1-10/31	27		15		42	0
11/1-11/30	21		27		48	0
12/1-12/31	26		14		40	0
Totals	318	315	202	145	520	460





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Disposition of Completed Investigations
Cases opened as of January 1, 2012 and closed as of September 30, 2012
N=140 Closed Cases/354 Allegations



Disposition of Completed Investigations
Open as of Jan 1, 2011 and closed as of December 31, 2011
N=200 Closed Cases/584 Allegations

